

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA (SCRANTON)**

SHIRLEY ANN SUTTER and GLEN	:	
W. SUTTER, Wife and Husband,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	CIVIL ACTION
	:	NO. 3:20-cv-00182
CASCADES TISSUE GROUP,	:	
	:	
Defendant.	:	
	:	

**JOINT MOTION FOR EXTENSION OF
DISCOVERY AND OTHER PRE-TRIAL DEADLINES**

Pursuant to Rule 7.1 of the Local Rules of Court, Plaintiffs and Defendant, by and through their respective undersigned counsel, hereby jointly move for an order extending the defendant's expert disclosure deadline, the expert discovery deadline and other pre-trial deadlines in the above-captioned matter and, in support thereof, aver as follows:

1. On August 13, 2020, this Court entered an Order granting the parties' Joint Motion for Extension of Discovery and other Pre-Trial Deadlines that extended previous deadlines by 60 days and established, among other dates, a deadline for plaintiffs to serve expert reports by October 19, 2020 and for defendant to serve its expert reports by November 19, 2020. (Doc. No. 35.)

3. Plaintiffs served their expert reports on October 19, 2020.
4. Due to scheduling conflicts and other professional responsibilities of defense counsel and defendant's experts, an additional 14 days is needed to complete and serve defendant's expert reports.

5. In addition, due to defendant's recently announced plan to close its Ransom plant and likely related site work, the parties might need to conduct additional fact discovery regarding site conditions.

6. To allow the parties sufficient time to complete discovery, the parties hereby jointly request the following extension for completion of discovery and other pretrial deadlines as follows:

- a. Defendant's expert reports must be completed and served by **December 3, 2020**.
- b. Any rebuttal reports to experts' reports must be filed within 14 days after receipt of the report unless further extension is granted by the Court.
- c. Expert discovery and depositions must be completed by **January 18, 2020**.
- d. Summary judgment motions must be filed by **February 4, 2021**.
- e. Responses to summary judgment motions must be filed by **March 8, 2021**.
- f. Replies to responses to summary judgment motions (if any) must be filed by **March 22, 2021**.
- g. After summary judgment motions are ripe, the case will be stayed until disposition of the motions and further order of the Court.

7. The parties shall be permitted to conduct additional fact discovery relative to defendant's Ransom plant site conditions within the timeframe outlined above.

8. Granting this request for enlargement of time will not prejudice any party or unduly delay the disposition of this matter, but rather will facilitate the discovery process and enable the parties to complete necessary discovery.

WHEREFORE, Plaintiff and Defendant jointly respectfully request an Order enlarging the defendant's deadline to complete and serve expert reports, the completion of expert discovery

period and other pretrial deadlines consistent with the deadlines noted above, as provided in the attached proposed Order.

Respectfully submitted,

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Attorney for Plaintiffs,
Shirley Ann Sutter and Glen W. Sutter

Dated: November 17, 2020

CERTIFICATE OF SERVICE

I, JOHN P. McSHEA, hereby certify that a true and correct copy of the foregoing Joint Motion for Extension of Discovery and Other Pre-Trial Deadlines was served upon the following counsel of record via the Court's Electronic Case Filing system on this 17th day of November 2020.

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